

## ***SECTION 2 - REUSE STATUS***

Ten areas of the site are either currently in active use or are potentially being considered for reuse. For each of these areas, the current status and potential reuse issues/considerations are summarized below. An additional off-site location, the former Lonsdale Drive-In, has also been included because it is considered a critical natural habitat whose close proximity to the site may impact future response actions (see Figure 4).

While most of the identified areas represent discrete parcels with one known owner, in other cases it was more convenient to combine multiple parcels (e.g., a right-of-way extending over multiple parcels, or adjacent properties engaged in similar activities).

### **Area #1 - Industrial Park**

*Location:* Part of Operable Unit #1

*Current Uses:* This area of the site contains manufacturing facilities housing over six businesses, an industrial condominium complex, the town dog pound, and the town's little league ballpark.

Approximately 800 people work at the site, generating personal income and public revenues that are important to the local communities. This includes an estimated \$23.9 million in annual income, \$19.1 million in annual spending and \$668,000 in sales tax revenues from employees on the property. [Source: "Returning Superfund Sites to Productive Use - Peterson/Puritan, Inc." EPA 540-F-00-018, July 2000]

Throughout EPA's involvement at the site, the Agency has taken a number of actions to accommodate the needs of these businesses. In 1994, EPA entered into a Prospective Purchaser Agreement (PPA) with Hope Global (formerly Hope Webbing, Inc.) that allowed them to purchase an abandoned warehouse and property without being held responsible for previous contamination. This warehouse is now an active manufacturing facility producing specialty textiles.

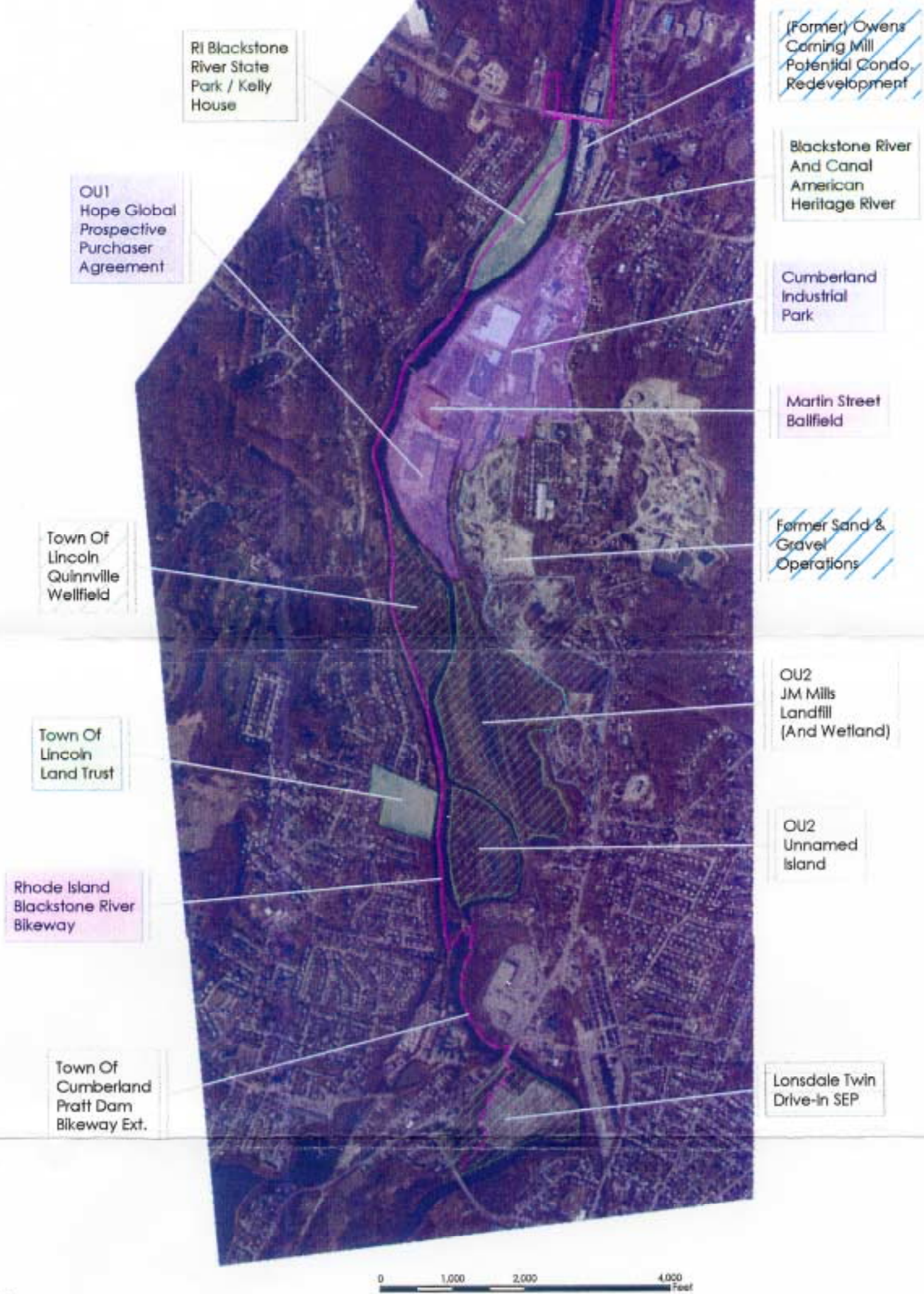


**Hope Global Facility, in OU1**

In addition, EPA has been careful to consider the future use of parcels when designing or implementing institutional controls. This was accomplished both in the structuring of the institutional controls and by making it a priority to respond to inquiries and proposals by on-site businesses regarding their use of the site.



Figure 4.  
Existing And Targeted  
Re-use In Vicinity Of  
Peterson/Puritan, Inc.  
Superfund Site



### Legend

#### LAND TYPE

- Open Space
- Potential Open Space
- Industrial
- Potential Industrial
- Recreation
- Potential Recreation
- Potential Residential

- Bikeway
- Bikeway Extension



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Plot file: ...re-use.pdf

Shaded and cross-hatched areas are  
approximate and are for presentation purposes only.

(See, for example, EPA's letter to Mr. Fred Sarmento, Fleet Construction Company, dated June 27, 2001, included in Appendices). The case team is trying to balance EPA's need to ensure that future changes to this portion of the site continue to be compatible with the remedy and the property owners's desire to have unfettered use of the land<sup>5</sup>.

EPA has also helped ensure the continued operation of these businesses by scheduling and conducting cleanup activities so as to avoid unnecessary disruption to on-going operations. For example, at the Hope Global property, monitoring wells and the groundwater treatment system were placed in a minimally-intrusive location. Similarly, the design and construction of the remedies involving source areas at the CCL Custom Manufacturing and the Pacific Anchor Chemical facilities were phased to reduce unnecessary impacts on plant operations.

*Potential Reuse Issues/Considerations:* The industrial/commercial area located in OU1 is expected to continue being used for that purpose and there are no indications that the town of Cumberland views this as inconsistent with general plans for the area. Recently it was learned that PAC is closing its on-site operations and intends to market the property.

It will be necessary to plan for the long-term management of these institutional controls so that they do not become an unnecessary impediment to future site use. This will be especially important since the remedy is in long term remediation and EPA's direct involvement is reduced.

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<sup>5</sup>The case team is striking this balance in three ways:

1. Easements and covenants have been crafted so that a landowner can petition EPA to remove all or some of the restrictions if it makes environmental sense to do so;
2. The easements and covenants restrict any construction that could adversely affect the remedy. EPA has tried to allay concerns that this restriction will completely limit use of land by sending to landowners a letter that (a) explicitly states EPA's commitment to promoting use of the land; (b) describes the purpose of the institutional controls in plain English; (c) describes the information that EPA needs to review and approve proposed construction projects; (d) commits to review such information expeditiously, and (e) establishes that EPA has a good track record of approving construction projects on properties that will be subject to institutional controls. EPA has sent one such letter already, and has offered to the PRPs to send such letters out to each property owner with whom the PRPs are negotiating institutional controls. (Included in Appendices, "EPA letter to Swissline Precision Manufacturing, Inc. dated April 12, 2001")
3. EPA has established a good track record of promptly reviewing proposed land use projects and approving them with some creative resolutions. For example, one property owner proposed to build a warehouse extension in the area where a monitoring well is located. EPA approved this extension conditioned on having the well flush-mounted inside the building to allow for future sampling.



## **Area #2 - Rhode Island Blackstone River State Park**

*Location:* Part of the potential Operable Unit #3

*Current Uses:* Although not yet fully implemented, the Rhode Island Blackstone River State Park is being established on the westerly extent of the site. This 20-acre park, which includes the use of the historic Kelly House as an information center, will greatly expand the recreational and educational opportunities for the green way project.

*Potential Reuse Issues/Considerations:* None Identified

## **Area #3 - Blackstone River Bikeway**

*Location:* Extends along the entire eastern extent of the site (Associated with OU1, OU2 and potential OU3)

*Current Uses:* EPA has worked closely with RIDEM, Rhode Island Department of Transportation (RIDOT) and others to enable a critical stretch of the 17-mile Blackstone River Bikeway to be built on the site. This portion of the Bikeway is currently in use.

*Potential Reuse Issues/Considerations:*  
None Identified



**Blackstone River Bikeway at Martin St.**

## **Area #4 - Blackstone River Canoe Trail**

*Location:* Extends along the entire eastern extent of the site (Associated with OU1, OU2 and potential OU3)

*Current Uses:* The three mile section of river and the canal adjacent to the site are part of a 40-mile canoe trail.

*Potential Reuse Issues/Considerations:*

The site cleanup will help to improve the quality of these waters and the associated ecosystem by eliminating significant sources of contamination. The result will be a healthier and more enjoyable experience for canoeists and other users.

In addition, portions of the site are under consideration as potential boat launches, observation areas, trails and other uses that would support the use of the canoe trail.

### **Area #5 - Nearby Lonsdale Twin Drive-In**

*Location:* Off-Site

*Current Uses:* The former Lonsdale Drive-In site, located just down river from the site, is an integral part of the Blackstone River watershed and ecosystem and key to the overall rehabilitation efforts.



In 1995, a natural resource damage (NRD) claim was brought by federal trustees as part of the OU1 cleanup settlement. The respondents in that case agreed to pay \$47,000 to the U.S. Department of the Interior, which has subsequently earmarked the money to assist the restoration of the former Lonsdale Twin Drive-In site<sup>6 7</sup>.

*Potential Reuse Issues/Considerations:* The Blackstone River Bikeway is currently planned to go through the western portion of the Lonsdale Twin Drive-In parcel. The close proximity of this area to the site and its recognized value as wildlife habitat makes on-going restoration efforts potentially relevant to future response action decisions.

### **Area #6 - J.M. Mills Landfill**

*Location:* Part of Operable Unit #2

*Current Uses:* The privately-owned, 18-acre J. M. Mills Landfill is immediately adjacent to the river and rises to over 100 feet above ground level. Although not currently receiving waste, the area is believed to have operated as a landfill from 1954 through the early 1980s. The area has been fenced by EPA to restrict access. The landfill and surrounding area will be further investigated as part of the RI/FS being conducted for OU2.

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<sup>6</sup> Under CERCLA, these funds must be used on projects having some nexus to the damage claim being sought.

<sup>7</sup> In a separate precedent-setting settlement at the Landfill Resource and Recovery (LR&R) Superfund Site in North Smithville, RI, the respondents for LR&R agreed to contribute \$525,000 to purchase conservation easements within the Blackstone River Valley National Heritage Corridor. EPA authorized \$332,000 to be used by the state of Rhode Island to purchase the Lonsdale Twin Drive-In site in the area of the Valley Falls marsh, which is the largest and most significant wildlife marsh in northern Rhode Island and a key stopover for migratory birds along the Atlantic flyway. A coalition of federal, state and local government agencies will share in the cleanup and restoration of the site. Remaining funds were also used to purchase environmentally significant easements in the northern portion of the watershed.

*Potential Reuse Issues/Considerations:* Access to the J.M. Mills Landfill property is possible through easements from Mendon Road to the south and Martin Street to the north along and parallel to the rail road tracks.

The local town officials have expressed some interest in acquiring this parcel, or some portion of it, for town use. This might include a municipal storage facility, although various active and passive uses are also a possibility. The property is believed to be in tax arrears, and there are indications that the owner may not be interested in retaining ownership. EPA is not aware of any formal actions by the local officials to acquire the property. The owners have apparently not indicated other intentions for the parcel nor suggested an unwillingness to transfer the property to the town. To the contrary, the town of Cumberland has successfully obtained a portion of land from the landowner for the bike path extension. Therefore, it can be expected that favorable discussions between the town and the landowner could take place in the future for other segments of the site as well. At this point, however, the specific intentions of the owner, local officials and other potentially interested parties are not known.

The landfill and its perimeter may provide corridor habitat linkage through the valley for roaming species living within the flood plain.

Due to its proximate location to site contamination and to other factors, it is possible that some constraints could be placed on its use as the result of future remedial actions (e.g., the installation of a protective cap and associated easements and covenants to ensure long term integrity and functionality of the cap). Again, since the RI/FS has only recently begun, this is very speculative.

#### **Area #7 - Unnamed Island**

*Location:* Part of Operable Unit #2

*Current Uses:* This 23-acre island is located immediately upriver of the Pratt Dam at the southern extent of the site. The island currently serves as habitat for local wildlife and migrating birds. It also appears to play an important role in flood control and as a habitat corridor linking the Lonsdale marsh to Quinville. Land access is by a partially washed out gravel road leading from Pratt Dam. A large track-mounted excavator has been abandoned on the island. This excavator is visible from the bike path and local residents would like to have it removed. EPA and the RIDEM are also concerned that significant amounts of hydraulic fluids, fuel, motor oil and other materials may have been released to the soil from this equipment.

*Potential Reuse Issues/Considerations:* The future use of this unnamed island may be complicated by the fact that the ownership is uncertain. A private party is believed to be the owner, although they have been unwilling to acknowledge that ownership and appear uninterested in retaining the property. It is also unclear whether the island is located in Cumberland or in Lincoln since the Blackstone River forms the boundary between the towns, and the course of this river has changed appreciably over the years due to human intervention.

The entirety of the island is within the 10 year flood plain and not suitable for development. Potential uses for this area would likely be limited to light seasonal recreational options such as foot trails, open-area environmental classrooms, a canoe portage connecting the river to the canal at Pratt Dam, and a river's edge wildlife corridor. The RIDOT construction plan for the Blackstone River Bikeway indicates some consideration for re-grading to establish access to the island from the Pratt Dam river crossing.

The RI/FS for OU2 will further investigate the potential releases from the excavator and other areas where disposal may have occurred.

The ownership status and reuse intentions of the owner and other potentially interested parties will need to be resolved.

### **Area #8 - Sand and Gravel Operations**

*Location:* Part of Operable Unit #2

*Current Uses:* This privately-owned parcel remains active as a sand and gravel operation, however, the long-range plans of the owner are not clear. At the property owner's request, EPA provided a letter clarifying how the sand and gravel operations can proceed without interfering with the on-going remedial investigation and cleanup.

*Potential Site Reuse Issues/Considerations:* Plans to subdivide the property for commercial and residential uses have been filed with the town of Cumberland. It is not known whether the local officials have an alternative use in mind.

Clearly, the potential commercial and residential use presents a very different exposure scenario than that of the current industrial operations. The anticipated future use will need to be resolved expeditiously to avoid unnecessary delays to the site cleanup process.

Because the RI/FS for OU2 has not yet been completed, it is currently unknown what the potential implications will be for the future use of this parcel.

### **Area #9 - Pratt Dam Bikeway Extension**

*Location:* Part of Operable Unit #2

*Current Uses:* This strip of land was donated in 1999 to the town of Cumberland by the owner of the landfill. This parcel abuts the Pratt Dam at the southern edge of the site, and may include public right-of-way easements to Mendon Road.

The town accepted this parcel with the general expectation that it could be used to provide access to the river and extend the Blackstone River Bikeway to an adjacent commercial area. If completed, this extension would provide bikeway users with ready access to food and other services. The town has been in communication with local adjacent land owners, RIDOT, and the

Blackstone River Heritage Corridor Commission regarding the project. EPA's current understanding is that this parcel has not been formally included in RIDOT's construction plans for the bikeway. Construction on the extension has not yet begun.

*Potential Site Reuse Issues/Considerations:* It is unclear at this stage of the RI/FS whether issues relating to site contamination or solid waste disposal practices will have an impact on the use of this parcel. If feasible, expediting this portion of the RI/FS could resolve this uncertainty and potentially help the project move forward.



**Pratt Dam from Lincoln to Cumberland**

#### **Area #10 - Lincoln Quinnville Wellfield**

*Location:* Part of Operable Unit #2 and potential Operable Unit #3

*Current Uses:* This is a 15-20 acre parcel formerly used by the town of Lincoln as a municipal water supply. The property contained three pumping wells and supplied the town with much of its water supply prior to 1979. In 1979, the Rhode Island Department of Health (RIDOH) ordered the wells closed due to VOCs identified above health-based standards. Presently, the wells remain closed. The town of Lincoln settled its claim for loss of the water supply and is now connected to water service from other municipal supplies including the town of Scituate.

*Potential Site Reuse Issues/Considerations:* Town officials have indicated some interest in using this town-owned land for ballfields, although apparently no final decision has been made.

#### **Area #11 - Former Owens-Corning Property**

*Location:* Part of potential Operable Unit #3

*Current Uses:* The Owens-Corning Fiberglass Corporation-Ashton Plant (OC) is one of many historical textile mills along the Blackstone River for which the Heritage Corridor is known. This mill is located in Cumberland, RI along the east bank of the Blackstone River and is within the northern site boundary of the potential OU3. The facility was originally built in 1867 by the Lonsdale Company to manufacture cotton goods. The Company also had a second plant at Lonsdale, three miles downstream and south of Ashton, below the Pratt Dam.

The Ashton Plant was closed in 1935 by the Lonsdale Company. Owens-Corning purchased the Ashton Plant in 1941 and used it to manufacture fiberglass products. Through the 1970's the mill



site operations were diminishing and in January of 1984 the mill closed. The Industrial Factory Rentals Corporation obtained the property in 1984 and has since leased it to a number of small businesses for the past 20 years.

*Potential Site Reuse Issues/Considerations:* A redevelopment plan has been presented to the town of Cumberland Planning and Zoning Boards by Ashton Mill Joint Venture, Ltd. The Project has received Planned Unit Development approval of 214 rental residential units, and has also received all other necessary zoning variances and local historic district approvals. In the course of due diligence, environmental assessments and voluntary cleanup actions on the property have begun with state-level oversight. As the property cleanup activities progress, and the redevelopment process continues, EPA will work with the state and local stakeholders to gather and review the supporting documentation and, as necessary, consider further delineation of the northern boundary of the site.

### ***SECTION 3 - SITE-SPECIFIC PLANNING & IMPLEMENTATION SUPPORT***

This section outlines a number of activities that EPA intends to implement in considering future use (including potential reuse) at the site. It is important to recognize that because the individual site parcels are owned by private parties and state- and local-governments, EPA does not have direct control over the future use of these parcels. Therefore, EPA's primary role will be in ensuring consideration of local reuse planning efforts and making reasonable accommodations to consider site reuse in site response actions. This section provides a general framework for activities that EPA may undertake to help local stakeholders identify future land use (including potential reuse) at the site. Many of the details for assistance and collaboration will be worked out through future coordination with stakeholders.

This document is based on information that was readily available to the EPA case team and is not purported to be a comprehensive, complete reuse assessment. Similarly, the reuse issues and considerations identified in this section represent only a partial list of the potential site-specific factors that may need to be considered.

#### ***General Reuse Profile - Operable Units***

The site covers over 500 acres and is subdivided into approximately 40 parcels with numerous ownership scenarios. For purposes of the Superfund cleanup, however, the site has been partitioned into operable units whose approximate boundaries are defined by environmental conditions rather than by legal property lines or by types of land use. Because operable units basically represent different phases of site cleanup, they create a convenient administrative context for EPA to consider site reuse (For example, as part of the RI/FS currently underway for OU2, the current and likely future uses for each of the properties falling within that OU will be determined). A general land use profile of each operable unit follows.

Operable Unit #1: The area comprising OU1 is largely dominated by the industrial park. Despite the Pacific Anchor Company's decision to close its on-site facility, the industrial park is believed to be operationally stable and viable (notably, PAC has indicated their intent to actively market this facility). Within OU1, the potential for areal expansion of industrial/commercial operations is limited, although the adjacent sand and gravel operations may provide some expansion opportunities. For these reasons, it is not expected that significant shifts in types of property usage will occur within OU1 in the near term.

Operable Unit #2: In OU2, the physical constraints will largely determine the direction of future uses. Significant areas are located in wetlands and cannot be developed. Some parts of the J.M. Mills Landfill may prove suitable for permanent structures, but this will not be known with any certainty until the RI/FS is conducted. These parcels do, however, have tremendous conservation and open space value, and their strategic placement within the Blackstone River watershed make them a potentially important acquisition for that purpose.

Operable Unit #3: Although the precise boundaries of potential OU3 have not been delineated, the Blackstone River State Park constitutes a sizable portion of the area likely to be encompassed by that operable unit. The former Owens-Corning property, which occupies the northeastern fringe of potential OU3, is currently being considered for renovation into residential units. Because of its close proximity, the use of this property would likely be of relevance to the future site remediation activities. Specific information on the remaining parcels within potential OU3 is not currently known.

### **Potential Reuse Issues/Considerations**

Site Ownership: Due to the large number of separate parcels, diverse ownership, and the mixed use of the site, resolution of site control issues will be critical to successful reuse. Depending on what the local communities envision for the future use of the privately-owned parcels, they may need to consider the possibility of acquisition or other site control options such as easements and partnership agreements. This would be particularly true for those privately-owned parcels where the owner's intended use may not be consistent with the broader community plans for the site.

With the exception of the unnamed island, the ownership status of the remaining parcels is known. Of the estimated 40 parcels, approximately 90 percent are privately-owned. The remaining parcels are owned by the towns of Cumberland and Lincoln and by the state of Rhode Island. The federal government does not currently own, lease or directly control property on the site.

Site Reuse Planning: The town of Cumberland is revising its comprehensive plan. This plan generally encompasses the site and the surrounding area, but does not currently provide a detailed reuse plan for the site, itself. Cumberland's previous comprehensive plan also did not provide much detail in support of the Heritage Corridor and Bikeway plans since land use for this purpose are predominately located on the Lincoln side of the river. The town of Lincoln is revising its comprehensive plan this year as well.

It would appear that some additional site-specific reuse planning may be necessary to flesh out local community expectations regarding the site, particularly as it applies to the J.M. Mills Landfill, the unnamed island, Pratt Dam bikeway extension, the Owens-Corning property and the sand and gravel operations. Design charrettes or planning workshops represent one potential way to resolve these uncertainties. These typically involve bringing together local, state & regional planners; landscape architects; economic development and environmental organizations; and other appropriate stakeholders to brainstorm and conceptualize alternative reuse options.

Because the site is located in both Cumberland and Lincoln, it is advisable that these communities develop a joint planning process. Close coordination with the National Heritage Corridor and the Blackstone River Bikeway projects will continue to be important.

Institutional Controls: As discussed, the remedy for OU1 establishes institutional controls to ensure that future changes to this portion of the site continue to be compatible with the remedy. These institutional controls impose some use limitations that may need to be factored into future

land use planning. The remedy for OU2 and the potential OU3 may also result in the establishment of institutional controls involving other areas of the site.

Third Party Liability Concerns: Despite efforts by EPA to minimize the potentially adverse impacts of the site remedy on existing and future uses, the uncertainty over potential Superfund liability may continue to be a concern for prospective owners. As discussed, a PPA has already been executed for a party to address their specific concerns. It is expected that additional redevelopment efforts will take place at the site and that prospective purchasers will seek the protection found in a PPA.

Project Timing: OU2 is currently the focus of an on-going RI/FS (which is expected to continue through to approximately January, 2004). In order to better tailor the RI/FS and support future remedy decisions, it is important that remaining questions regarding the anticipated future use of that portion of the site be resolved as quickly as possible. In particular, there appears to be considerable uncertainty involving the J.M. Mills Landfill, the sand and gravel operation and the unnamed island. Similarly, although less time critical, potential uses of the area comprising the potential OU3 should be explored in advance of any future RI/FS activities.

It may be possible to take interim or accelerated steps relative to site cleanup to enable portions of the site to be used sooner, or to mitigate temporary impacts of site remediation activities (e.g., dust generation, soil erosion, general site appearance, etc.). For example, expediting the remedial investigation in the vicinity of the town-owned parcel identified as Area #9 (“Pratt Dam Bikeway Extension”) may result in the proposed Bikeway extension being completed more quickly.

Linkage to Off-Site Re-Use Projects: As repeatedly emphasized throughout this document, the site’s location makes it of primary importance to various regional projects. It is likely, therefore, that these projects will influence how some portions of the site may be used. For this reason, close coordination with the various private and government organizations involved in these projects will continue to be important.

New Town Administration for Cumberland: In November 2000, significant changes took place to the town administrations of both Cumberland and Lincoln. The EPA case team has since attended a meeting with each of the town’s leadership to discuss the status of the site and solicit further communication. However, specific intentions from the towns’ leadership regarding site reuse has not yet been fully explored.

### ***Follow-up EPA Activities***

**Planning Support:** Uncertainty regarding the intended future use of key parcels suggests the desirability of additional site reuse planning. This may consist of parcel-specific planning, with each parcel owner determining the intended end use, or it may involve community-based, site-wide planning. While EPA is prepared to consider future land use under either approach, the Agency believes there are substantial benefits to be gained from addressing reuse on a site-wide or regional basis.



Since the RI/FS for OU2 is still in its relatively early stages, and future RI/FS work is planned for potential OU3, the site may be a good candidate for an EPA Superfund Redevelopment Initiative (SRI) pilot. SRI pilots provide up to \$100,000 in funding and other resources to enable local communities to better evaluate and identify future land use at nearby Superfund sites. Design charettes and planning workshops are a common component of existing SRI pilots. Only federal, state, local and tribal governmental entities are eligible for SRI pilots. Typically, the recipients are municipal or tribal governments representing the communities in which the site is located. Presuming that sufficient funds are allocated in FY02 to support another round of SRI pilots, this site would be a high priority for the Region.

With or without an SRI pilot in-place, EPA will work closely with the local communities, property owners, PRPs and other stakeholders to support activities that can better evaluate potential future land use.

#### Implementation steps:

1. Meet and work with federal, state and local commissions, coalitions, and partnerships on a frequent basis to lend technical support and provide other resources to promote a more comprehensive understanding of the Superfund cleanup. Involvement would include:
  - a. Monthly attendance and service on the Blackstone River Valley Watershed Council.
  - b. Partnering of key Superfund staff with Office of Ecosystem Protection staff.
  - c. Obtaining a working knowledge and establishing contacts involving relevant state and EPA programs and initiatives and related issues (e.g., “Urban Rivers Initiative”, non-point source, and TMDL issues, etc).
  - d. Periodic attendance at state and local planning meetings and forums where plug-in on key technical and planning issues are warranted.

#### **Key EPA Superfund Personnel: RPM**

**Status (Target Date): ONGOING**

5. Meet with town officials from Cumberland and Lincoln, the EPA river navigator and other key partners to discuss future land use (including potential reuse) and outline follow-up steps. This meeting is pivotal since the towns will need to take the leadership role in future site reuse planning activities. The meeting agenda will generally include:
  - a. Confirmation of information regarding the parcel ownership and intended uses.
  - b. Potential EPA resources available, particularly the SRI pilot program.
  - c. Preliminary discussion of potential reuse issues. This includes consideration of both short-term and longer-term uses of the site, and mitigation of temporary impacts of site remediation activities (e.g., dust generation, soil erosion, general site appearance, etc.).
  - d. An overview of EPA process for considering the existing and future land use (including site reuse).
  - e. An identification of short term information needs regarding the site investigation and cleanup, Superfund requirements, EPA policies regarding site reuse, etc.

**Key EPA Superfund Personnel:** SRI Team and RPM

**Status (Target Date):** April 2002

3. Subject to their continuing interest and the availability of funding, EPA will work with the towns of Cumberland and Lincoln to establish an SRI pilot. Significant milestones include:
  - a. Preparation by the towns of a pre-application that includes a project outline and estimated budget.
  - b. Selection of the pilot proposal for funding.
  - c. Preparation of the pilot application and project work plan.
  - d. Awarding of the SRI pilot cooperative agreement

**Key SF Personnel:** SRI Team w/ support from RPM

**Status ( Target date):** TBD - Subject to availability of funds

4. Coordination of future land use activities with the site investigation and cleanup.
  - a. Maintain communication with key stakeholders so that relevant site-specific studies, reports and other information is available to relevant stakeholders.
  - b. Provide technical and legal support to assist property owners, prospective owners, PRPs and other parties to understand EPA policies, requirements and guidance pertaining to the use of Superfund sites.
  - c. Expedite investigation of the Pratt Dam bikeway extension parcel.
  - d. Continue to track and support as necessary the Lonsdale Twin Drive-in SEP project and to coordinate with the EPA and State water resources programs.
  - e. Continue to work with the EPA River Navigator, State Watershed Coordinator, Corridor Commission, and State Planning Coordinator to identify and follow-up on opportunities for consideration of reuse activities at these regional projects in the remediation process.

**Key Superfund Personnel:** RPM and Case attorney

**Status (Target date):** ONGOING

5. EPA will further support the SRI pilot and other reuse planning efforts on an as-needed-basis by:
  - a. Helping to obtain access to alternate dispute resolution (ADR) and facilitation resources.
  - b. Involving them in EPA-sponsored workshops, conferences, and other forums with other SRI pilots to exchange information and ideas.
  - c. Aiding to develop key contacts and roles.
  - d. Providing information and guidance on relevant federal, state and private programs and resources that may support the reuse planning process and the implementation of site reuse activities.

**Key Superfund Personnel:** SRI Team w/ support from RPM

**Status (Target date):** February 2003

**Implementation Support:** EPA will continue to assist existing and prospective businesses and other property owners by making reasonable accommodations and providing information and guidance regarding the site.

**Implementation steps:**

1. On an as-needed-basis, EPA will provide the following technical assistance:
  - a. Written guidance and technical assistance regarding relevant EPA policies, requirements and guidance pertaining to site use.
  - b. Copies of existing and future comfort letters, PPAs and institutional controls relating to the site to interested parties requesting them.
  - c. Information and guidance on relevant federal, state and private programs and resources that may support the current or planned use.
2. Coordination of future land use (including potential site reuse) activities with the site investigation and cleanup.
  - a. Issuance of PPAs and comfort letters
  - b. Consideration of future land use (including potential reuse) plans in the scheduling, design and implementation of the RI/FS and subsequent response actions.
  - c. Work with property owners and tenants to determine if planned alterations to their property will adversely impact the RI/FS and response actions, pose undue risks, or violate the terms of institutional controls.
  - d. Select, design and implement response actions that protect human health and the environment, and at the same time minimize restrictions on the current and intended uses.

**Key Superfund Personnel:** RPM, case attorney and SRI Team

**Status (Target date):** ONGOING